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In the Matter of  
LPFM Notice of Proposed Rulemaking  
(LPFM) Broadcast Service

Before the  
Federal Communications Commission  
Washington, D.C. 20554

FCC MM Docket 99-25

Comments of James J. Henderson

I would like to thank the Commission for moving forward on low-power FM. Now let us discuss the best ways to make it work. I will use as my comments a real life example.

Our coast community is near in miles to a large urban area. But because of terrain we are physically isolated. People want to know what is happening in our community. There is no coverage from metro radio stations. This becomes acute when storms and weather conditions cut off our roads. My point is this: we need a radius of 9 miles to cover all the residents of this coastal community. It is doubtful that we could put a 1000 watt station on the air because of the many stations "over the hill." On the other hand a 100 watt station **will not cover our community.**

To solve this problem we need the Commission to use a "prohibited contour overlap" method of predicting interference, as is now easily done in the Low Power television service with the appropriate computer program. This would allow for many more LPFM stations to be created and would make the use of standard "directional patterns" feasible — another probable need to get a station on the air in our community.

So I beg the question: if a 1000 watts is too much to squeeze in and 100 watts is not enough to cover the area — what about 900, 800, 700, 600, 500 watts? With a LPTV "prohibited contour overlap" method with directional antennas this would solve our problem. Because of the above listed conditions I urge the FCC to increase to 100 meters for LPFM antennas. This would allow for more coverage for stations under 1000 watts that need to cover and serve their communities. LP-1000 stations should have the same antenna height as Class-A stations.

Some other important concerns that go to the heart of LPFM success in a community such as ours:

- LPFM must not be subjected to a narrower bandwidth than full-power FM stations since audio quality could suffer. I support dropping sub-carriers other than stereo to prevent interference.
- We must be able to **sell commercials** to survive. The Commission should allow for both commercial and non-commercial stations. It is one thing to be a non-profit IRS Section 503-C station. We could still sell commercials. But a non-commercial station cannot. In our area we need to be able to sell commercials to operate. And besides, there is only a weekly newspaper and advertisers would, I am sure, like to reach out and touch residents more than once a week!
- LPFM is for local community citizens — not the big corporations that own most stations already! There must be ownership restrictions to keep this service for local owners. I believe it is imperative that the owner of a LPFM license live no more than 50 miles from the community of license. And I say no more than 1 station to a license holder! **This service must be for those not now holding broadcasting licenses: am/fm/tv.**

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page two

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- The FCC should try some form of "first-come first-served" application process with five-day filing windows. If this system proves unworkable, only then should the Commission consider using auctions to select between mutually exclusive (MX) applications. And if auctions are considered there must be some form of substantial "bidding credits" available to small business applicants that would allow us to compete with applicants that have large financial resources at their disposal.

For all the reasons listed in these comments, I strongly feel that Class LP-1000 stations should include stations from 1000 watts down to 200 watts, with multiple mileage separation tables provided as mentioned above. These stations should be "primary status" and protected to their 1mV/m (60 dBu) contour.

If the Commission truly wants to bring back and increase community service, then please allow for the concerns/suggestions I have brought to you. For my community at least, having the changes listed above is probably the only way **meaningful** radio will come to our under served area.

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